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December 28, 2023

VIA ECF

Honorable Katherine Polk Failla
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: Mecea v. Newsweek Digital LLC, 1:23-cv-5734 (KPF)

Dear Judge Failla:

We represent Plaintiff Robert Mecea in the above-captioned case and write to respectfully request a 30-day extension of time to file dismissal papers or otherwise re-open the case.

- (1) the original deadline is December 31, 2023 [Dkt. No. 24] and the proposed new deadline is January 30, 2024.
- (2) there have been no previous requests for an extension of this deadline.
- (3) No previous requests have been granted or denied
- (4) the parties respectfully request an extension in an effort to consummate their settlement agreement without judicial intervention.
- (5) Counsel for Defendant consents to the request.
- (6) No other scheduled dates will be impacted by this request.

Respectfully Submitted,

s/ *James H Freeman* /
James H. Freeman

Counsel for Plaintiff

Application GRANTED. The parties shall file their dismissal papers or otherwise move to re-open this case on or before **January 30, 2024**.

The Clerk of Court is directed to terminate the pending motion at docket number 25.

Dated: December 28, 2023
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE